

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

OCCIDENTAL CHEMICAL CORPORATION,)	Hon. Madeline Cox Arleo
)	Hon. Magistrate Joseph A. Dickson
Plaintiff,)	
)	Civil Action No. 2:18-cv-11273
v.)	
)	NOTICE OF MOTION
21 ST CENTURY FOX AMERICA, INC., <i>et al.</i> ,)	
)	Return Date: To be determined
Defendants.)	ORAL ARGUMENT REQUESTED

TO: John McDermott, Esq.
William J. Stack, Esq.
Charles J. Dennen, Esq.
ARCHER & GRENIER, P.C.
One Centennial Square
Haddonfield, NJ 08033

Kathy D. Patrick, Esq.
Anthony N. Kaim, Esq.
Jorge M. Guterrez, Esq.
GIBBS & BRUNS, LLP
110 Louisiana, Suite 5300
Houston, TX 77002

*Attorneys for Plaintiff
Occidental Chemical Corporation*

Larry D. Silver, Esq.
David M. Romine, Esq.
Jennifer Graham Meyer, Esq.
Erin M. Carter, Esq.
LANGSAM STEVENS SILVER &
HOLLAENDER, LLP
1818 Market Street, Suite 2610
Philadelphia, PA 19103

ALL OTHER COUNSEL OF RECORD

PLEASE TAKE NOTICE that on a date and at a time to be determined by the Court, Defendant Chargeurs, Inc. (“Chargeurs”) will move before the Court for an Order dismissing Plaintiff Occidental Chemical Corporation’s (“OxyChem”) Complaint for Lack of Personal Jurisdiction over Chargeurs and, Alternatively, for Summary Judgment pursuant to Federal Rules of Civil Procedure 12(b)(2) and 56 and Local Civil Rule 56.1(a).

PLEASE TAKE FURTHER NOTICE that Chargeurs shall rely on (1) Chargeurs’ Brief in Support of Motion to Dismiss for Lack of Personal Jurisdiction and, Alternatively, for

Summary Judgment; (2) Chargeurs' Statement of Material Facts Not in Dispute; (3) OxyChem's and Chargeurs' Stipulation of Authenticity of Documents; and (4) the Declaration of Steven M. Richman, all of which are served herewith.

PLEASE TAKE FURTHER NOTICE that alternative proposed forms of Order are enclosed.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Respectfully submitted,

Dated: December 16, 2019

CLARK HILL PLC

By: /s/ Steven M. Richman

Steven M. Richman, Esq.
srichman@clarkhill.com

210 Carnegie Center
Suite 102
Princeton, NJ 08540
(609) 785-2911

David G. Ries, Esq.*
dries@clarkhill.com
Joseph R. Brendel, Esq.*
jbrendel@clarkhill.com

One Oxford Centre
301 Grant Street, 14th Floor
Pittsburgh, PA 15219-1425
(412) 394-7711

Attorneys for Defendant,
Chargeurs, Inc.

*Admitted *Pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2019, I caused the foregoing **NOTICE OF MOTION** along with the following documents:

- 1. CHARGEURS' BRIEF IN SUPPORT OF MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION OR, ALTERNATIVELY, FOR SUMMARY JUDGMENT;**
- 2. CHARGEURS' STATEMENT OF MATERIAL FACTS NOT IN DISPUTE PURSUANT TO RULE 56 AND LOCAL CIVIL RULE 56.1;**
- 3. OXYCHEM'S AND CHARGEURS' STIPULATION OF AUTHENTICITY OF DOCUMENTS;**
- 4. DECLARATION OF STEVEN M. RICHMAN; AND**
- 5. PROPOSED ORDER**

to be served upon all counsel of record by filing same through the CM/ECF Electronic filing system of the United States District Court for the District of New Jersey.

/s/ Steven M. Richman